

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE

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DANIEL LOVELACE and  
HELEN LOVELACE, Individually, and as Parents of  
BRETT LOVELACE, deceased,

Plaintiffs,

VS.

NO.: 2:13-cv-02289 dkv  
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;  
BABU RAO PAIDIPALLI; and,  
MARK P. CLEMONS, M.D.,

Defendants.

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NOTICE OF SERVICE OF DISCOVERY RESPONSES

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Defendant, Mark P. Clemons, M.D., by and through counsel of record, state that on December 20, 2013, this Defendant served his responses to the Plaintiffs' First Set of Request for Production of Documents, Responses to Plaintiffs' First Request for Admissions and an unverified copy of Answers to First Set of Interrogatories propounded by Plaintiffs by placing said responses in the United States Mail, first class, postage prepaid.

Respectfully submitted,

THOMASON HENDRIX HARVEY  
JOHNSON & MITCHELL, PLLC

By: /s/ Marcy D. Magee  
J. KIMBROUGH JOHNSON (7953)  
MARCY D. MAGEE (19360)  
Attorneys for Defendant, Mark Clemons, M.D.  
40 South Main Street, 29<sup>th</sup> Floor  
Memphis, TN 38103  
(901) 525-8721

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been properly served upon all counsel of record identified below via the Court's ECF filing system

Mr. Mark Ledbetter  
Halliburton & Ledbetter  
254 Court Avenue, Suite 305  
Memphis, TN 38103

Mr. David Cook  
Mr. Al McLean  
The Hardison Law Firm  
119 S. Main Street, Suite 800  
Memphis, TN 38103

This the 20<sup>th</sup> day of December, 2013.

By: /s/ Marcy D. Magee  
Marcy D. Magee